

EXHIBIT 117

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

09:09:27

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - - x

C O N F I D E N T I A L

Videotaped oral deposition of
Richard Kahn taken pursuant to notice,
was held REMOTELY, commencing May 18,
2023, 9:21 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

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1 R. Kahn

2 accounts at JPMorgan? 10:46:23

3 A. I was not that involved in the cash 10:46:25

4 withdrawal process. I believe it was [REDACTED] 10:46:30

5 that was requesting it; potentially Harry was 10:46:33

6 going to get it from the bank. 10:46:37

7 But I do recall there was a certain 10:46:41

8 period of time when I first started that 10:46:44

9 there were large withdrawals of cash, and 10:46:48

10 that was because the pilots were requesting 10:46:54

11 cash because they were able to negotiate 10:46:59

12 favorable rates from the fuel provider when 10:47:04

13 they would take long trips, they would get a 10:47:08

14 better rate if they paid with cash. 10:47:11

15 So there were larger withdrawals 10:47:14

16 because I think at that time jet fuel was 6- 10:47:17

17 or \$7 per gallon, and the plane could hold 6- 10:47:22

18 to 8,000 gallons, you know, it was a large 10:47:26

19 amount that was being paid for fuel. 10:47:29

20 Q. Which pilots were requesting cash? 10:47:30

21 A. I don't recall which ones, but I 10:47:34

22 believe the pilots at the time were Larry 10:47:37

23 Visoski, Dave Rogers, and Bill Hammond. 10:47:40

24 Q. And you think it was Visoski, 10:47:46

25 Rogers, or Hammond that were requesting cash? 10:47:49

1 R. Kahn

2 to that entity. 11:27:01

3 Q. What was the plane entity, 11:27:02

4 Hyperion, Inc.? 11:27:06

5 A. Hyperion was one of the plane 11:27:06

6 entities, and I believe JEGE, Inc. was the 11:27:08

7 other. 11:27:12

8 Q. And when we are talking about cash 11:27:12

9 that is paid for fuel, are you saying cash 11:27:14

10 being wire transferred to a fuel company, or 11:27:20

11 are you saying cash being -- somebody goes to 11:27:24

12 the teller, withdraws cash money -- 11:27:28

13 A. Correct. 11:27:28

14 Q. -- and then hands that for fuel? 11:27:30

15 MS. ELLSWORTH: Object to form. 11:27:32

16 A. Correct. 11:27:33

17 MS. ELLSWORTH: I'm not sure what 11:27:34

18 cash you are using in this context. 11:27:37

19 MR. EDWARDS: I'm having the same 11:27:39

20 problem. 11:27:40

21 Q. So what do you mean by cash? 11:27:40

22 A. My understanding of cash is green 11:27:41

23 bills. 11:27:44

24 Q. Okay. 11:27:46

25 A. Not a wire or a check or not a 11:27:46

1 R. Kahn

2 money by wire to them, why would it make any 11:32:00
3 difference whether this is in green bills or 11:32:03
4 -- they're still receiving the money? 11:32:08

5 A. To answer your question, I think 11:32:10
6 what you are asking why in some circumstances 11:32:12
7 did we pay credit card, cash, or wire, and my 11:32:14
8 answer for that is kind of something that we 11:32:18
9 applied with all vendors, not just fuel. We 11:32:20
10 were always trying to get the best prices, 11:32:23
11 whether it was fuel, whether it was an 11:32:25
12 architect, purchasing pretty much whatever it 11:32:27
13 was. So we would normally go where the best 11:32:30
14 deal was. 11:32:33

15 So in the circumstance where 11:32:34
16 Mr. Epstein used green bills cash, I believe 11:32:37
17 that was a New York vendor, and I believe it 11:32:40
18 was JFK Airport, but I'm not 100 percent 11:32:42
19 sure. 11:32:47

20 In this example here, on the 11:32:47
21 exhibit, Exhibit 4, the last page, we were 11:32:48
22 able to get the best pricing by prepaying and 11:32:51
23 buying the fuel in bulk. 11:32:54

24 So we didn't discriminate against 11:32:56
25 using cash, credit card, or wire. We were 11:32:58

1 R. Kahn

2 seeking the best pricing. 11:33:00

3 Q. But by this point in time that we 11:33:01

4 are looking at, 2012, that's long after the 11:33:04

5 time period where you were using green bills 11:33:06

6 to pay for case -- I mean to pay for fuel? 11:33:08

7 A. I only remember a short window of 11:33:11

8 time that we paid cash for fuel. 11:33:14

9 Q. And that short window being before 11:33:16

10 the time period Jeffrey Epstein went to jail 11:33:17

11 in Florida; meaning, early in your 11:33:19

12 relationship? 11:33:22

13 A. Correct. 11:33:23

14 Q. And during that period of time 11:33:24

15 where you would have used cash, would that 11:33:26

16 money have come from the -- from your office, 11:33:30

17 picked up by Larry Visoski, and taken to 11:33:35

18 whoever the vendor was for fuel? 11:33:38

19 MS. ELLSWORTH: Object to form. 11:33:41

20 A. Yes. At the time New York Strategy 11:33:43

21 Group would have been the office that Larry 11:33:48

22 came to and collected the cash, correct. 11:33:51

23 Q. And would you have had receipts for 11:33:53

24 that fuel? 11:33:55

25 A. We wouldn't have them at the time 11:33:57